

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

YASMINE MAHONE, on behalf of herself and
all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

Case No. 2:22-cv-00594-RAJ

STIPULATED MOTION TO EXTEND
DEADLINE TO FILE ANSWER OR
OTHER RESPONSIVE PLEADING
TO CLASS ACTION COMPLAINT
AND [PROPOSED] ORDER

NOTE ON MOTION CALENDAR:
MAY 24, 2022

STIPULATION

Pursuant to Federal Rule of Civil Procedure 6(b), the parties hereby jointly request that the Court extend Defendant Amazon.com, Inc.'s ("Amazon") deadline to answer, move, or otherwise respond to the Complaint until June 27, 2022.

Plaintiff Yasmine Mahone served her Class Action Complaint on Amazon on May 5, 2022. Pursuant to FRCP 12(a)(1), Amazon must answer, move, or otherwise respond to the Complaint by May 26, 2022. On May 20, 2022, the parties met and conferred and agreed that the requested extension is necessary to allow Amazon to fully investigate this matter and the allegations in the Complaint, to allow Amazon's counsel adequate time to coordinate with their client on a response, and for counsel to meet and confer, if and as necessary. Accordingly, in the interest of judicial economy, the parties seek an extension for Amazon to answer, move, or otherwise respond to the Complaint until June 27, 2022.

STIPULATION TO EXTEND DEADLINE AND
[PROPOSED] ORDER – 1
(Case No. 22-CV-594)

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Phone: +1.206.359.8000
Fax: +1.206.359.9000

1 RESPECTFULLY SUBMITTED this 24th day of May 2022.

2 By: s/ Heather L. Shook

3 Andrew E. Moriarty, Bar No. 28651

4 Heather L. Shook, Bar No. 56610

5 **Perkins Coie LLP**

6 1201 Third Avenue, Suite 4900

7 Seattle, Washington 98101-3099

8 Telephone: +1.206.359.8000

9 Facsimile: +1.206.359.9000

10 AMoriarty@perkinscoie.com

11 HShook@perkinscoie.com

12 Attorneys for Defendant Amazon.com, Inc.

13 By: s/ Daniel Kalish

14 Daniel Kalish, Esq., WSBA 35815

15 **HKM Employment Attorneys LLP**

16 600 Stewart Street, Suite 901

17 Seattle, WA 98101

18 Telephone: 206-826-5354

19 Email: dkalish@hkm.com

20 Attorneys for Plaintiff

21
22
23
24
25
26
STIPULATION TO EXTEND DEADLINE AND
[PROPOSED] ORDER – 2
(Case No. 22-CV-594)

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Phone: +1.206.359.8000
Fax: +1.206.359.9000

[PROPOSED] ORDER

Based upon the foregoing Stipulation, IT IS HEREBY ORDERED that Amazon shall answer Plaintiff's Class Action Complaint on June 27, 2022.

DATED this _____ day of _____ 2022.

The Honorable Richard A. Jones

PRESENTED BY:

s/ Heather L. Shook

Andrew E. Moriarty, Bar No. 28651

Heather L. Shook, Bar No. 56610

Perkins Coie LLP

1201 Third Avenue, Suite 4900

Seattle, Washington 98101-3099

Telephone: +1.206.359.8000

Facsimile: +1.206.359.9000

AMoriarty@perkinscoie.com

HShook@perkinscoie.com

Attorneys for Defendant Amazon.com, Inc.

STIPULATION TO EXTEND DEADLINE AND
[PROPOSED] ORDER – 3
(Case No. 22-CV-594)

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Phone: +1.206.359.8000
Fax: +1.206.359.9000

CERTIFICATE OF SERVICE

I certify under penalty of perjury that on May 24, 2022, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notification of the filing to the email addresses indicated on the Court's Electronic Mail Notice List.

Daniel Kalish, Esq.
HKM Employment Attorneys LLP
600 Stewart Street, Suite 901
Seattle, WA 98101
Telephone: 206-826-5354
Email: dkalish@hkm.com

Brian J. Lawler
PILOT LAW, P.C.
850 Beech Street, Suite 713
San Diego, CA 92101
Tel: 619-255-2398
Email: blawler@pilotlawcorp.com

Gene J. Stonebarger
STONEBARGER LAW, APC
101 Parkshore Dr., Suite 100
Folsom, CA 95630
Tel: 916-235-7140
Email: gstonebarger@stonebargerlaw.com

Kevin L. Wilson
KEVIN WILSON LAW PLLC
3110 Horton Avenue
Louisville, KY 40220
Telephone: 502-354-3330
Email: kevin@kwilsonlaw.com

Dated: May 24, 2022

s/ Heather Shook
Heather Shook

CERTIFICATE OF SERVICE
(Case No. 22-CV-594)

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Phone: +1.206.359.8000
Fax: +1.206.359.9000